UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

WESTPORT INSURANCE CORPORATION,)))
Plaintiff, v.)) CIVIL ACTION NO) 1:05-cv-11780 NMG
RICHARD C. HEIDLAGE, KOTIN, CRABTREE AND STRONG, LLP, AND NORTH AMERICAN UNDERWRITING MANAGERS, INC.))))
Defendants.)))

STIPULATION AS TO TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT

The parties hereby stipulate and agree that the time within which Heidlage shall have to respond to Westport's Motion for Summary Judgment shall be extended to October 13, 2006. As grounds for this stipulation, the parties state that they have agreed that Westport would produce its claim file and that Heidlage's response to Westport's Motion for Summary Judgment would be due thirty days following the deposition of Westport claim representative Ellen McCarthy, which is scheduled for September 13, 2006, at 10:00 a.m.

> RICHARD C. HEIDLAGE By his attorney,

/s/ Richard M. Bluestein

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WESTPORT INSURANCE CORPORATION

/s/ Steven J. Bolotin

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Dated: August 9, 2006

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document was served upon counsel of record for each party hereto by the Court's electronic filing system on this 9th day of August, 2006.

> /s/ Richard M. Bluestein Richard M. Bluestein

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